

National Environmental Performance Track (NEPT) Program
Revision of EMS Entry Criterion
Independent Party EMS Assessment Policy
October 24, 2003

Summary of Policy. To ensure the quality of EMSs at NEPT member facilities, NEPT is revising the EMS entry criterion for applying facilities. Prior to applying to the Program, facilities must have had an independent party assessment of their EMS. For the purpose of this revised criterion, an independent party is one that is neither directly employed by the applying facility nor has played a substantive role in developing the facility's EMS. The EMS assessment shall be conducted using the NEPT EMS protocol or one that is consistent with the NEPT EMS protocol.

Effective Date. This policy will become effective for facilities applying to the program for consideration during the application period beginning February 1, 2004. The facility must have had the assessment conducted within the three-year period prior to the date of application. The facility will be asked to certify on their NEPT application the date of their independent EMS assessment and that the independent assessment meets the criteria of this policy.

Applicability to Current NEPT Members. The revised EMS criterion will not apply to facilities currently in NEPT that have not had an independent party assessment. Instead, EPA/States will conduct site visits at each of these facilities during 2003 to determine the adequacy of their EMSs and will address EMS issues prior to NEPT Program renewal. Regional Performance Track Coordinators will contact these member facilities to arrange site visits.

Options for an Independent Party Assessment. Facilities applying to NEPT can select from a number of options for an independent party assessment of their EMS. Applying facilities should consult with their EPA Regional Performance Track Coordinator before choosing this independent party. An applying facility may choose from the following options:

- (1) A pre-acceptance assessment (site visit) conducted by either an EPA or State performance-based EMS program and led by an individual meeting the qualifications of a Performance Track Site Visit Leader (see attached);
- (2) Participation in an EPA or State EMS Pilot Program where EPA or the State has assessed the facility's EMS against NEPT or equivalent criteria and the assessment was led by an individual meeting the qualifications of a Performance Track Site Visit Leader;
- (3) An assessment conducted by one of the following so long as the lead auditor is not directly employed by the facility and did not play a substantive role in developing the EMS for the facility:
 - a. an individual certified as an EMS lead auditor by the Registrar Accreditation Board (RAB) or the Board of Environmental, Health & Safety Auditor Certifications (BEAC);
 - b. an individual who has demonstrated that they meet the qualifications of a Performance Track Site Visit Leader, except those qualifications related to the NEPT site visit training course, having conducted a minimum of two NEPT site visits, and current employment;
 - c. a corporate audit team whose audit team leader meets the requirements of 3(a) or (b) above;
 - d. a trade association performance-based EMS audit program whose audit team leader meets the requirements of 3(a) or (b) above; or
 - e. mentors that participate in the NEPT mentoring program and who meet the requirements of 3(a) or (b) above.
- (4) An assessment of a Federal facility EMS conducted according to the *Environmental Management Systems Agency Self-Declaration Protocol for Appropriate Federal Facilities* that incorporates the NEPT EMS Protocol and results in a valid self-declaration.
- (5) An assessment conducted by other entities will be considered on a case-by-case basis in consultation with EPA/states.

EMS Protocol. The EMS assessment shall be conducted using the most recent version of the NEPT EMS site visit protocol or a state protocol that is consistent with the NEPT protocol.¹ The NEPT EMS is modeled after ISO 14001 with an additional emphasis on a commitment to pollution prevention, compliance, and public interaction; therefore, other protocols may be used so long as they address these additional NEPT elements. Please consult with EPA/State to discuss the

¹The most recent NEPT site visit protocol is available on the web at www.epa.gov/performance-track.

acceptability of other protocols.

Qualifications for Performance Track Site Visit Leaders
October 24, 2003

Individuals wishing to serve as a Site Visit Leader for a Performance Track site visit must self-certify that they meet the qualifications listed below. Certification forms will be made available on EPA's Performance Track Website (www.epa.gov/performancectrack). The EPA Performance Track Program will maintain a list of qualified site visit leaders. This list will be accessible to both EPA and state personnel.

Background Requirements for NEPT Site Visit Leaders	
Education	High school diploma
Training	<p>40-hour ANSI-RAB NAP Accredited ISO 14001 (EMS) Lead Auditor Training; course examination must have been passed;</p> <p>Performance Track Site Visit Training (given by EPA) and successful completion of NEPT Site Visit Leader exam (given at the end of the EPA training)</p>
Work and Audit Experience	<p>Work experience¹: in environmental management, environmental science and technology, environmental regulation, or related field as follows:</p> <ul style="list-style-type: none"> ▶ 5 years experience for Leads with high school degree ▶ 4 years experience for Leads with college degree <p>Audit experience: 20 work-day equivalents of environmental auditing,² which includes a minimum of four EMS audits³</p> <p>Participation in at least two NEPT site visits as part of a site visit team. These two audits can be part of the minimum four EMS audits required above.</p>
Current Employment	To qualify as a Site Visit Leader, the individual must currently work at EPA or a state environmental agency or be a duly authorized agent of EPA or the State.

¹Years of work and audit experience are the same as those required for ISO 14001 auditors.

²Audit experience can include regulatory, compliance assistance, pollution prevention, or EMS audits.

³EMS audit experience can include ISO audits, EPA NEPT audits, or State EMS-program audits.